

**Subject:** Mealman v. Brown County, et al. - BCJ site visit

**Date:** Wednesday, October 12, 2022 at 2:00:41 PM Central Daylight Time

**From:** John Bradley

**To:** Mills, Sara C., 'Paul J. Pytlik'

**CC:** Rick Resch, Kate McCarthy, Nickerson, Jennifer J., Harrison, Tammy L., Flood, Zachary J.

Sara, Zack and Paul,

Pursuant to FRCP 34(a)(1), we would like to inspect electronically stored information within the ERMA program and OMS program as well as Tonya Mealman's paper medical file containing her medical records prior to the implementation of ERMA at BCJ. We primarily want to look at the ERMA/OMS data related to Tonya Mealman within each system, but we also want to look at some general information such as the grievance section and reports section of the OMS program. We would also like to briefly go back to the Hotel pod while we are at the jail.

If possible, we would like to coordinate this with a day that we will already be in Green Bay for depositions, but if that is not possible, we can make a separate trip up for this purpose.

Thank you.

**John H. Bradley**

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